

EXHIBIT A

From: Goldberg, Seth A.
Sent: Monday, March 22, 2021 9:09 PM
To: Adam Slater; Frank H. Stoy
Cc: valpec@kirtlandpackard.com; Clem C. Trischler; Jason M. Reefer; Priselac, Jessica; CohenL@gtlaw.com; Victoria Lockard; harkinss@gtlaw.com; Johnston, Sarah; Jeff Geoppinger
Subject: RE: Valsartan Status Conference

Counsel:

Having not heard back from you on the email below, we intend to include in our submission a request for the Court's guidance as to whether the Louisiana cases can be amended given that all claims have been dismissed with prejudice.

Seth



From: Goldberg, Seth A.
Sent: Sunday, March 21, 2021 10:27 AM
To: 'Adam Slater' ; Frank H. Stoy
Cc: valpec@kirtlandpackard.com; Clem C. Trischler ; Jason M. Reefer ; Priselac, Jessica ; CohenL@gtlaw.com; Victoria Lockard ; harkinss@gtlaw.com; Johnston, Sarah ; Jeff Geoppinger
Subject: RE: Valsartan Status Conference

Adam:

The Louisiana plaintiff issue is a matter of housekeeping, not substantive. In entering MTD Order No. 5, the Court dismissed with prejudice all claims arising under Louisiana law, as subsumed by the Louisiana Products Liability Act (LPLA), and all claims under the New Jersey Consumer Protection Act. Thus, 39 Louisiana plaintiffs cases were dismissed in their entirety. We intend to ask the Court for guidance as to whether the Court believes it is necessary to enter an order dismissing those cases by caption name/number. As 5 of the 39 cases are also bellwether selections, we'd ask the Court to direct the parties to replace their respective

selections. If you disagree with either of the above, or would like to discuss tomorrow or Tuesday, please let us know.

Best,
Seth



From: Adam Slater <ASlater@mazieslater.com>

Sent: Friday, March 19, 2021 3:20 PM

To: Frank H. Stoy <FHS@pietragallo.com>

Cc: valpec@kirtlandpackard.com; Clem C. Trischler <CCT@pietragallo.com>; Jason M. Reefer <JMR@pietragallo.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; CohenL@gtlaw.com; Victoria Lockard <0000000354b9781e-dmarc-request@lists.duanemorris.com>; harkinss@gtlaw.com; Johnston, Sarah <sarah.johnston@btlaw.com>; Jeff Geoppinger <jgeoppinger@ulmer.com>

Subject: Re: Valsartan Status Conference

Hi Frank. I don't know if I can get back today but I will try.

What is the basis for dismissing Louisiana cases so we can address that issue?

Adam M. Slater
Mazie Slater Katz & Freeman

Sent from my iPhone

On Mar 19, 2021, at 3:11 PM, Frank H. Stoy <FHS@pietragallo.com> wrote:

Adam,

Defendants have identified the following topics for the March 24, 2021 status conference with Judge Vanaskie and Judge Kugler:

1. Dismissal of Louisiana Cases
2. Bellwether Trial Pool Order and Plaintiffs' Proposed Bellwether Trial Plan
3. Downstream Defendants' Obligations Regarding Defendant Fact Sheets
4. Plaintiff Fact Sheet Show-Cause Submission

Could you please let us know by the end of the day today if there are additional topics Plaintiffs intend to raise? Also, can we agree to submit our Agenda Statements jointly at 2:00 PM ET on Tuesday?

Thank you.

Frank

Frank H. Stoy, Esquire

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